

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	No. _____
	)	
Plaintiff,	)	<b>18 U.S.C. § 1344</b>
	)	(Bank Fraud)
v.	)	
	)	NMT Thirty Years Imprisonment
<b>TAMMY M. ALLEN,</b>	)	NMT \$1,000,000 Fine
[DOB: 09/29/1962],	)	NMT Five Years Supervised Release
	)	Class B Felony
Defendant.	)	
	)	\$100 Special Assessment
	)	
	)	Restitution May Be Ordered

**I N D I C T M E N T**

THE GRAND JURY CHARGES THAT:

**Introduction**

1. In 2007, Defendant **TAMMY M. ALLEN** was elected secretary/treasurer (S/T) of Retail, Wholesale, Department Store Union, Local 184L (Union). The duties of S/T included receiving and paying all bills for the Union and co-signing checks drawn on the Union's account.
2. The Union maintained its business checking account at UMB, Kansas City, Missouri. At all times material to this indictment, the financial institution of UMB was FDIC insured by the United States Government. The name of the Union account at UMB was "Bakery, Confectionery Workers Local Union 184L, Affiliated RWDSU AFL-CIO" and the account number was 200059455.
3. Beginning in 2008, **TAMMY M. ALLEN**, misappropriated \$45,766.81 of Union funds for her own personal use from the Union's UMB account.

**Purpose of the Scheme and Artifice**

4. Between on or about January 1, 2008, and continuing through on or about March 1, 2010, in the Western District of Missouri, and elsewhere, defendant **TAMMY M. ALLEN** knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain money, funds, and credits and other property owned by and under the custody and control of the UMB, Kansas City, Missouri, by means of material false and fraudulent pretenses, representations, and promises.

5. Defendant **TAMMY M. ALLEN** utilized two primary methods to fraudulently obtain Union funds; she would write Union checks to herself or cash, and she would pay herself for “lost time” to which she was not entitled.

6. It was a part of the scheme that defendant **TAMMY M. ALLEN**, wrote approximately 38 unauthorized checks, totaling \$35,484.45, drawn on the Union account made payable to “Tammy Allen” or “cash”, without the required approval or knowledge of the Union vice-president, Derrald Levels, or the Union president, Derwin McNeely.

The 38 unauthorized checks are as follows:

NUMBER	CHECK No.	CHECK DATE	PAYEE	AMOUNT
1	12452	03/27/08	UMB BANK (cash)	\$ 2,451.78
2	12557	05/20/08	UMB BANK (cash)	\$ 625.79
3	12558	06/13/08	UMB BANK (cash)	\$ 350.00
4	12608	06/30/08	CASH	\$ 1,000.00
5	12623	07/08/08	UMB BANK (cash)	\$ 450.00
6	12651	07/25/08	UMB BANK (cash)	\$ 2,200.00

NUMBER	CHECK No.	CHECK DATE	PAYEE	AMOUNT
7	12666	08/03/08	TAMMY ALLEN	\$ 310.00
8	12673	08/11/08	UMB BANK (cash)	\$ 1,350.00
9	12720	09/04/08	UMB BANK (cash)	\$ 550.00
10	12762	10/07/08	UMB BANK (cash)	\$ 375.00
11	12810	10/31/08	UMB BANK (cash)	\$ 500.00
12	12842	11/18/08	UMB BANK (cash)	\$ 750.00
13	12858	12/05/08	CASH	\$ 425.00
14	12879	12/15/08	CASH	\$ 500.00
15	13000	03/05/09	TAMMY ALLEN	\$ 377.00
16	13032	03/31/09	UMB BANK (cash)	\$ 160.00
17	13040	04/02/09	UMB BANK (cash)	\$ 450.00
18	13070	04/20/09	TAMMY ALLEN	\$ 518.00
19	13076	05/02/09	UMB BANK (cash)	\$ 1,850.00
20	13150	06/15/09	TAMMY ALLEN	\$ 110.00
21	13182	06/19/09	UMB BANK (cash)	\$ 716.48
22	13223	07/03/09	UMB BANK (cash)	\$ 2,758.00
23	13283	08/06/09	UMB BANK (cash)	\$ 550.00
24	13306	08/17/09	CASH	\$ 500.00
25	13308	08/25/09	UMB BANK (cash)	\$ 2,050.00
26	13333	09/08/09	TAMMY ALLEN	\$ 554.26
27	13342	09/15/09	TAMMY ALLEN	\$ 364.00
28	13344	09/17/09	UMB BANK (cash)	\$ 250.00
29	13363	09/26/09	TAMMY ALLEN	\$ 480.80
30	13375	10/01/09	UMB BANK (cash)	\$ 475.00
31	13377	10/02/09	TAMMY ALLEN	\$ 2,600.00

NUMBER	CHECK No.	CHECK DATE	PAYEE	AMOUNT
32	13391	10/06/09	BANK (cash)	\$ 2,500.00
33	13409	10/29/09	UMB BANK (cash)	\$ 240.00
34	13501	12/01/09	STAPLES	\$ 1,471.10
35	13503	12/04/09	TAMMY ALLEN	\$ 58.00
36	13531	12/10/09	TAMMY ALLEN	\$ 379.24
37	13559	12/31/09	CASH	\$ 2,415.00
38	13616	02/01/10	UMB BANK (cash)	\$ 1,800.00

7. It was further a part of the scheme that defendant **TAMMY M. ALLEN**, had the Union vice-president, Derrald Levels, pre-sign the fraudulent checks from March 2008 until July 2009. Additionally, from July 2009 until February 2010, **TAMMY M. ALLEN** forged the signature of the Union president, Derwin McNeely, on the remaining fraudulent checks.

8. It was further a part of the scheme that defendant **TAMMY M. ALLEN**, fraudulently caused approximately 10 checks to be drawn on the Union account between January 1, 2008, and September 9, 2008, for claimed “lost wages” of the defendant **TAMMY M. ALLEN** to which she was not entitled.

9. As a result of the scheme, defendant **TAMMY M. ALLEN** fraudulently caused UMB to disburse \$45,766.81 of Union funds to her.

**COUNT ONE**  
(Bank Fraud)

The Government realleges and incorporates by reference, the allegations in paragraphs one (1) through nine (9) of this Indictment.

On or about October 2, 2009, in the Western District of Missouri, and elsewhere, defendant **TAMMY M. ALLEN**, with the intent to defraud, knowingly executed and attempted to execute a scheme to defraud and to obtain money and funds owned by and under the custody and control of a Federally-insured financial institution, that is the UMB, Kansas City, Missouri, whose accounts were and are insured by the Federal Deposit Insurance Corporation, by means of material false and fraudulent pretenses, representations and promises, by drafting a check without proper authorization or approval for her personal benefit and forging the signature thereon, that is, defendant wrote check number 13377 on the UMB bank account of the Union, dated October 2, 2009, in the amount of \$2,600.00, payable to "Tammy M. Allen", and forged the signature of Union president, Derwin McNeely, and presented Union check number 13377 to KC Fairfax Federal Credit Union on October 2, 2009, thereby causing UMB to disburse \$2,600.00 to KC Fairfax Federal Credit Union where then \$1,500.00 was given to defendant **TAMMY M. ALLEN** in cash and \$1,100.00 was deposited into defendant **TAMMY M. ALLEN**'s personal checking account at the KC Fairfax Federal Credit Union account number 15460-00.

All in violation of Title 18, United States Code, Section 1344.

A TRUE BILL.

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11/19/10

DATE

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/s/ Micheal R. Bailey

FOREPERSON OF THE GRAND JURY

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/s/ Roseann A. Ketchmark  
Roseann A. Ketchmark  
Assistant United States Attorney